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IN THE UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF MICHIGAN

IN RE:

§ CASE NO. 18-01857

Ross William Schueller § Ch. 13

Krista Ann Schueller § Hon. Scott W Dales
Debtor(s) § Filed 4/24/2018

DEBTORS' RESPONSE TO TRUSTEE'S MOTION TO DISMISS CHAPTER 13 PROCEEDINGS

NOW COME Debtor(s), Ross William Schueller & Krista Ann Schueller, by their Attorney, Jeffrey D. Mapes, and for their response to the Trustee's Motion to Dismiss Chapter 13 Proceedings, states as follows:

- 1. That this Chapter 13 case was filed on 4/24/2018.
- 2. That Confirmation of the Chapter 13 Plan is pending.
- 3. That the Debtors deny that any delay is unreasonable or prejudicial to creditors.
- 4. That the Debtors are cooperating with the Trustee and are working to provide all documents, information, and amendments necessary for confirmation of their Chapter 13 Plan.

WHEREFORE, the Debtors request that this Honorable Court deny the Trustee's Motion to Dismiss Chapter 13 Proceedings and grant the Debtors such other and further relief as is just in the premises.

Dated: 7/17/2018 /s/George J. George

Jeffrey D. Mapes, Attorney for Debtor George J. George, Associate Attorney

29 Pearl St. NW, Ste. 305 Grand Rapids, MI 49503 Phone: (616) 719-3847

Fax: (616) 719-3857

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 17, 2018, a true and correct copy of

the foregoing was served on all parties in interest below.

Dated: <u>7/17/2018</u> /s/George J. George

Jeffrey D. Mapes, Attorney for Debtor George J. George, Associate Attorney

29 Pearl St. NW, Ste. 305 Grand Rapids, MI 49503 Phone: (616) 719-3847

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DEBTORS:

Ross William Schueller Krista Ann Schueller 7849 Hollyhock Jenison, MI 49428

CHAPTER 13 TRUSTEE

Brett N. Rodgers ecf@rodgersch13.com, backup1@rodgersch13.com

U.S. TRUSTEE

United States Trustee 125 Ottawa NW Ste 202R Grand Rapids, MI 49503